

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

DEAN OBEIDALLAH,

Plaintiff,

v.

ANDREW B. ANGLIN,
DBA *Daily Stormer*,

and

MOONBASE HOLDINGS, LLC,
DBA Andrew Anglin,

and

JOHN DOES NUMBERS 1–10,
Individuals who also assisted in the
publication or representation of false
statements regarding
Mr. Obeidallah,

Defendants.

CASE NO. 2:17-CV-00720-EAS-EPD

Chief Judge Edmund Sargus

Magistrate Judge Elizabeth Preston Deavers

**DECLARATION OF ABID R. QURESHI IN SUPPORT OF PLAINTIFF'S RENEWED MOTION FOR
LEAVE TO CONDUCT LIMITED DISCOVERY IN AID OF SERVICE**

I, Abid R. Qureshi, am an attorney licensed to practice law in the District of Columbia and am admitted *pro hac vice* in the above-captioned case. I am an attorney with Latham & Watkins LLP and am counsel of record for Plaintiff Dean Obeidallah. I declare as follows:

1. Attached hereto as **Exhibit 1** is a true and correct copy of the document requests that Plaintiff proposes to serve on the following individuals and entities: (1) Greg Anglin; (2) Zappitelli CPAs; (3) GoDaddy; (4) Bandwidth; and (5) the U.S. Postal Service.

2. Attached hereto as **Exhibit 2** is a true and correct copy of an email sent on or about October 13, 2017 by Mr. Obeidallah's counsel to Mr. Marc Randazza.

3. Attached hereto as **Exhibit 3** is a true and correct copy of an email sent on or about October 13, 2017 by Mr. Obeidallah's counsel to Defendant Andrew B. Anglin.

4. Attached hereto as **Exhibit 4** is a true and correct copy of an email sent on or about December 15, 2017 by Mr. Obeidallah's counsel to Mr. Jay Wolman.

5. Attached hereto as **Exhibit 5** is a true and correct copy of an email sent on or about December 15, 2017 by Mr. Obeidallah's counsel to Mr. Mathew Stevenson.

6. Attached hereto as **Exhibit 6** is a true and correct copy of a print out from KeepMeUp.com reflecting registration information for the *Daily Stormer*'s original web domain, www.dailystormer.com, when it was established with registrar GoDaddy on or about March 20, 2013.

7. Attached hereto as **Exhibit 7** is a true and correct copy of a print out from the Ohio Secretary of State's Business Filing Portal regarding Morning Star Ministries USA, Inc.

8. Attached hereto as **Exhibit 8** is a true and correct copy of a print out from the Yahoo search engine reflecting contact information for Christian Counselors Group.

9. Attached hereto as **Exhibit 9** is a true and correct copy of a Certificate issued by the Ohio Secretary of State reflecting Defendant Moonbase Holdings, LLC's registration of "Andrew Anglin" as an Ohio trade name.

10. Attached hereto as **Exhibit 10** is a true and correct excerpted copy of a December 13, 2016 article originally published by Defendant Anglin on the *Daily Stormer*'s .COM domain, www.dailystormer.com, titled *Support the Daily Stormer – With Your Credit Card!*.

11. Attached hereto as **Exhibit 11** is a true and correct copy of the January 12, 2017 application by Greg Anglin to establish PO Box 208, Worthington, Ohio 43085 on behalf of Defendant Anglin.

12. Attached hereto as **Exhibit 12** is a true and correct copy of an April 27, 2017 article published on the *Daily Stormer's* .COM domain, www.dailystormer.com, titled *SPLC Is Suing Anglin! Donate Now to Stop These Kikes.*

13. Attached hereto as **Exhibit 13** is a true and correct copy of a Certificate issued by the Ohio Secretary of State reflecting Defendant Anglin's registration of "Daily Stormer" as an Ohio trade name.

14. Attached hereto as **Exhibit 14** is a true and correct copy of a print out from WhoIs.ai reflecting registration information for the *Daily Stormer's* .AI web domain, www.dailystormer.ai.

15. Attached hereto as **Exhibit 15** is a true and correct copy of a print out from WhoIs.com reflecting registration information for the *Daily Stormer's* .RED web domain, www.dailystormer.red.

16. Attached hereto as **Exhibit 16** is a true and correct copy of a June 1, 2017 article published by Defendant Anglin on the *Daily Stormer's* .RED domain, www.dailystormer.red, titled *Dean Obeidallah, Mastermind Behind Manchester Bombing, Calls on Trump to Declare Whites the Real Terrorists.*

17. Attached hereto as **Exhibit 17** is a true and correct copy of a Certificate issued by the Ohio Secretary of State reflecting the establishment of Defendant Moonbase Holdings, LLC as an Ohio domestic, for profit limited liability company.

18. Attached hereto as **Exhibit 18** is a true and correct copy of a print out from the Franklin County, Ohio Auditor's website reflecting information regarding 5271 Norwich Street, Hilliard, OH 43026.

19. Attached hereto as **Exhibit 19** is a true and correct copy of a print out from the Franklin County, Ohio Auditor's website reflecting information regarding 5275 Norwich Street, Hilliard, OH 43026.

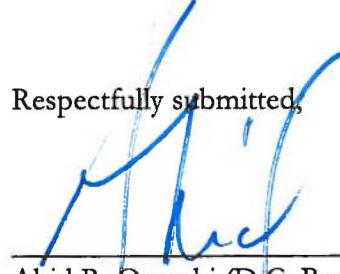
20. Attached hereto as **Exhibit 20** is an true and correct excerpted copy of a print out from the Zappitelli CPAs Inc.'s "Contact Us" page.¹

21. Attached hereto as **Exhibit 21** is a true and correct excerpted copy of a print out from the Zappitelli CPAs Inc.'s "Services" page.

22. Attached hereto as **Exhibit 22** is a true and correct copy of a print out from GoDaddy.com reflecting registration information for the *Daily Stormer*'s original web domain, www.dailystormer.com, as of August 15, 2017.

23. Attached hereto as **Exhibit 23** is a true and correct copy of a print out from TheCallRegister.com identifying Bandwidth.com as the "Registrant Company" for Defendant Anglin's phone number.

Respectfully submitted,



Abid R. Qureshi (D.C. Bar No. 459227)
LATHAM & WATKINS LLP
555 Eleventh St., NW, Suite 1000
Washington, D.C. 20004-1304
Phone: 202.637.2200
Fx: 202.637.2201
abid.qureshi@lw.com

Attorney for Plaintiff Dean Obeidallah

¹ In the interest of privacy, Plaintiff's counsel has redacted personal photographs, a phone number, and fax number from Exhibit Nos. 20 and 21.